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November 3, 2022

VIA ECF

Hon. Paul A. Engelmayer
United States District Court
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *In re: One Apus Container Ship Incident on November 30, 2020*
1:22-md-03028-PAE (lead case)

This Letter pertains to:

Msig Mingtai Insurance Co. Ltd. v. Danmar Lines Ltd., et al., 21-cv-07994

Starr Indemnity & Liability Company, et al. v. Trust Freight Services, Inc., et al., 21-cv-09370

Travelers Property Casualty Company of America v. All-Ways Forwarding Int'l Inc., et al., 21-cv-09388

Navigators Management Company, Inc. v. Kintetsu World Express, Inc., 21-cv-09546

Hanesbrands Inc., et al. v. EFL Container Lines, LLC, et al., 21-cv-09858

De Well Container Shipping, Inc. v. M/V ONE APUS in rem, et al., 21-cv-09980

The People's Insurance Company of China (Hong Kong), Ltd. v. Damco International B.V., et al., 21-cv-10113

XL Insurance Company, et al. v. All-Ways Forwarding Int'l Inc., et al., 21-cv-10177

All-Ways Forwarding Int'l, Inc. v. M/V ONE APUS in rem, et al., 21-cv-10154

Atlantic Specialty Insurance Company v. All-Ways Forwarding Int'l Inc., et al., 21-cv-10344

Federal Insurance Company a/s/o SJ Creations, Inc. v. Orient Express Container Co., Ltd., 21-cv-09975

C.H. Robinson International, Inc. d/b/a Christal Lines v. M/V ONE APUS, in rem, et al., 22-cv-05221

AIT Worldwide Logistics, Inc., et al. v. M/V ONE APUS, in rem, et al., 22-cv-05220

Damco International B.V., et al. v. The Motor Vessel ONE APUS, in rem, et al., 22-cv-05222

Apex Logistics International, Inc., et al. v. M/V ONE APUS, in rem, et al., 22-cv-01815

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Dear Judge Engelmayer,

We are attorneys for Chidori Ship Holding LLC and Jessica Ship Holding SA, making restricted appearances as owners and bareboat charterers, respectively, of the M/V ONE APUS. As explained in more detail below, we write to inform the Court that we will be re-filing Answers in certain actions related to the subject multi-district litigation.

Specifically, in checking the various dockets, we determined that Answers we timely filed in the 22-MD-3028 docket are not electronically linked to the underlying docket for which the Answer was intended. In speaking with the SDNY ECF Helpdesk, we learned that these Answers were not properly “spread” to the cases to which they corresponded with due to an error in the filing system, and therefore did not also appear on the corresponding, underlying dockets.

In the short term, all of the parties should have received copies of our various Answers via ECF. Long term, if we do nothing to correct the dockets, certain dockets will be “incomplete.” Based on our consultation with the SDNY ECF Helpdesk and a subsequent call to Your Honor’s Clerk, we believe it is better to correct the various dockets now. Accordingly, we will re-file these Answers on the corresponding, underlying dockets. A copy of this letter will also be filed on these dockets to ensure that everyone understands why Answers are being filed again and will appear with two sets of timestamps.

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If there are any questions, please do not hesitate to contact us. Otherwise, we thank Your Honor in advance for understanding.

The Court has received counsels' letter
and thanks them for it. SO ORDERED.

A handwritten signature in dark ink, appearing to read 'Paul A. Engelmayer', written over a horizontal line.

PAUL A. ENGELMAYER
United States District Judge
November 4, 2022

Respectfully submitted,
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CC by ECF to all counsel of record